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December 6, 2013

VIA U.S. MAIL

Regional Freedom of Information Officer
U.S. EPA, Region 6
1445 Ross Avenue
Environmental Protection Agency, (6MD-OE)
Dallas, TX 75202-2733

Re: Freedom of Information Act Request
Freddie Beauchamp, Jr. v. American Honda Motor Company, Inc., et al.
Los Angeles Superior Court Case No.: BC514293
Our Client: ArvinMeritor, Inc. and Maremont Corporation

Dear Sir or Madam:

We are requesting the disclosure of the following records pursuant to the Freedom of Information Act (Public Law 89-554, 80 Stat. 383; Amended 1996, 2002, 2007), within the next ten business days. All requested records pertain to the following locations, collectively referred to as the Premises:

- Tascosa High School, 3921 Westlawn Ave, Amarillo, TX 79102
- Pantex Plant, 720 6th Ave, Amarillo, TX 79101
- Potter County Detention Center, 13100 NE 29th, Amarillo, TX 79111
- Amarillo Road Company, 3300 Farm to Market Road 1258, Amarillo, TX 79118
- The City of Amarillo, Maintenance Department, City Hall, 509 S.E. Seventh Avenue, Amarillo, Texas 79105

(1) Any records or documents¹ pertaining to the construction, maintenance, rebuilding, repairs/remodeling work and/or abatement work performed on the Premises, which in any way involved asbestos.

¹ The term "record" and the term "document" are used in the broadest sense possible and mean the original and any non-identical copy (e.g., any copy which is different from the original in any way) of any written, recorded, printed, typewritten, or handwritten matter of any kind or nature (however produced, reproduced, or recorded), including but without limitation, all blueprints, work specifications, daily reports, time cards, letters, telegrams, e-mail, facsimiles, memoranda, reports (preliminary and final), studies, samples, testing protocols, diaries, logs, maps, pamphlets, notes, charts, graphs, calendars, schedules, tabulations, analysis, statistical information, accumulations, books, magazines, telephone bills, minutes, summaries, or other records of meetings, conversations, and hearings of

(2) Any records or documents identifying any and all persons, contractors, or other entities who performed construction, maintenance, rebuilding, repair/remodeling, and/or abatement work on the Premises, which in any way involved asbestos.

(3) Any records or documents pertaining to any asbestos abatement work performed on the Premises.

(4) Any records or documents regarding research, investigations, air testing, reports and/or study data from air testing and air sampling which measured the amount of asbestos fiber either in the ambient air and/or released when asbestos was used, machined, operated, or otherwise disturbed on the Premises.

(5) Any records, documents, or letters from the EPA pertaining to warnings, citations, or violations at the Premises, which in any way involved asbestos.

(6) Any records or documents, including but not limited to reports, studies, and/or secondary research provided by the EPA, which addressed the issue of health hazards created by or associated with exposure to asbestos.

(7) Any written communication from the EPA to the Premises, which in any way involved asbestos.

FOIA allows you to segregate material that is exempt from material that is not exempt. If you determine that some portion of the requested documents is exempt, please provide me with the remainder of the documents. If you determine that some of the documents are exempt from release, please justify withholding of those records by demonstrating that the records are exempt or that the public interest in confidentiality outweighs the public interest in disclosure. We reserve the right to appeal any such determination.

I agree to pay the reasonable costs involved in retrieving and copying the records requested. If there is a charge for this information, please inform me if the charge exceeds \$50.00.

any kind, photographs, slides, videotapes, film impressions, data, data compilations, computer files, computer documents, audiotape recordings, magnetic tapes, sound or mechanical reproductions, computer printouts, contracts, drafts of contracts, leases, subleases, instruments, agreements, warnings, directives, instructions, citations, violations, drawings, hearing transcripts, reports, summaries of investigations or negotiations, opinions or reports of consultations, consultants, or proposed experts, and press releases, now or at any time in the Occupational Safety and Health Administration's possession, custody, or control or known or believed by the Occupational Safety and Health Administration to exist or have existed. "Record" or "document" also includes any underlying documents used to create summaries or other reports of financial or other data.

Hawkins Parnell
Thackston & Young LLP
December 19, 2013
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Sincerely,

**HAWKINS PARNELL
THACKSTON & YOUNG LLP**

A handwritten signature in blue ink, appearing to read 'Stephanie L. Bowlby', with a stylized, flowing script.

Stephanie L. Bowlby

SLB/da